



TACOMA PUBLIC UTILITIES
3628 South 35th Street
Tacoma, Washington 98409-3192

April 30, 2007

The Honorable Kevin Martin, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Emergency Petition for Waiver of 47 C.F.R. § 76.1204(a)(1) of the
City of Tacoma, d/b/a Click! Network

Dear Chairman Martin:

I am writing in support of Click! Network/Tacoma Power's Emergency Petition for Waiver of 47 C.F.R. § 76.1204(a)(1) of the City of Tacoma, dba Click! Network. Without a waiver, Click! would have to halt their digital transition. With a waiver, Click! can continue providing low-cost digital set-top boxes after July 1, 2007, and allow their customers to transition to the new digital environment at a reasonable price.

As Director of Tacoma Public Utilities, I am keenly aware of how this affects our customers, especially those on limited incomes.

I understand that in 1998 the FCC promulgated rules authorized by the Telecommunications Act of 1996 to promote the availability of third-party set-top boxes and other consumer equipment for use in cable systems. In these rules, the FCC stated that cable providers could no longer deploy new digital set-top boxes without CableCARDs after July 1, 2007. As you may know, CableCARD-compatible set-top boxes do not provide what Click! Network's cable customers want and the boxes are nearly three times as expensive. Today, CableCARD technology is only one-way and doesn't allow customers to get either an interactive cable guide or video-on-demand, two of the fastest growing features of our state-of-the-art cable system.

Since the Utility's investment in Click!, many economic benefits have been realized in the Tacoma region like increased telecommunications competition, lower costs of services and improved customer service.

Click! staff does everything it can to remain competitive in a marketplace dominated by the largest cable operator in the country, Comcast. Granting this waiver will help Click! remain competitive while providing a low-cost option for residents within Tacoma Power's service area.

Thank you for considering granting this waiver.

Sincerely,

Mark Crisson
Director of Utilities

Cc Cyndi Wikstrom, General Manager, Click! Network

